

Original

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIAGENE C. BENCKINI, T/A BENCKINI NURSERIESEDWIN MOYER ESTATE, DECEASED*(In the space above enter the full name(s) of the plaintiff(s).)*

- against -

UPPER SAUCON TOWNSHIP MUNICIPAL AUTHORITY COMPLAINTSEWAGE TREATMENT PLANT BURNY ROGERS MANAGER Jury Trial: ☒ Yes ☐ NoUPPER SAUCON TOWNSHIP, POLICE OFFICERS, (check one)BRIAN HAWK, AMY HAWK, STEPHEN KUEBLER, ROGER MILLEREDWARD HARTMAN, AND POLICE CHIEF ROBERT COYLE.UPPER SAUCON TOWNSHIP POLICE DEPARTMENT.*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)***I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>GENE C. BENCKINI</u>
	Street Address	<u>612 LOCUST ST.</u>
	County, City	<u>COOPERSBURG, PA. 18036</u>
	State & Zip Code	<u>CELL-484-767-8102</u>
	Telephone Number	<u>EDWIN MOYER, DECEASED, EXECUTOR: GENE C. BENCKINI</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name UPPER SAUCON TOWNSHIP MUNICIPAL AUTHORITY
 Street Address SEWAGE TREATMENT PLANT
 County, City 5500 CAMP MEETING RD.
 State & Zip Code CENTER VALLEY, PA. 18034

Defendant No. 2 Name UPPER SAUCON TOWNSHIP, MANAGER, BURNY ROGERS
 Street Address 5500 CAMP MEETING RD.
 County, City CENTER VALLEY, PA. 18034
 State & Zip Code _____

Defendant No. 3 Name UPPER SAUCON TOWNSHIP, POLICE OFFICERS
 Street Address 5500 CAMP MEETING RD.
 County, City CENTER , VALLEY, PA. 18034
XXXXXXXXXX, OFFICERS: POLICE CHIEF, ROBERT COYLE,
BRIAN HAWK, AMY HAWK, STEPHEN KUEBLER, ROGER MILLER
 Defendant No. 4 Name AND EDWARD HARTMAN.
 Street Address ALL EMPLOYEES OF UPPER SAUCON TOWNSHIP
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)
☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

VIOLETIONS OF CIVIL RIGHTS AND ENVIRONMENTAL LAWS

UNDER THE FOURTEENTH AMENDMENT TO THE CONSTITUTION

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. Where did the events giving rise to your claim(s) occur? 3361 PRESTON LANE, CENTER VALLE
AND 5516 VERA CRUZ RD., CENTER VALLEY, PA. 18034

- B. What date and approximate time did the events giving rise to your claim(s) occur? _____
STARTED IN 1978 TO 1986 ILLEGAL SEWAGE SPILLS AND DURING 2006,
2007 AND 2012, 2013 ALL SAME LEHIGH COUNTY.

- C. Facts: THE PLAINTIFF PURCHASED 15.4 ACRES OF LAND AT 3361 PRESTO
LANE CENTER VALLEY, PA. IN LEHIGH COUNTY TO GROW NURSERY STOCK
IN FIRST PURCHASE WAS (3) ACRES NEXT TO THE UPPER SAUCON TOWNSHIP
MUNICIPAL AUTHORITY SEWAGE TREATMENT PLANT OF A WOODED LOT, THE
SEWAGE TREATMENT PLANT STARTED DEVELOPING PROBLEMS STARTING IN TH
SPRING OF 1978 WHERE THEIR RAW SEWAGE SLUDGE TANKS WERE RUPTURING
AND SPILLING RAW SEWAGE THROUGH THEIR CHAIN LINK FENCE RIGHT UNTO
MY BUSINESS PROPERTY AND AROUND MY BUILDINGS, SURE I RAISE "CANE"
AND COMPLAINED TO THE OFFICIALS AND TOWNSHIP MANAGER, BURNY ROGE
AND DEMANDED THAT THEY STOP THIS IMMEDIATELY, THEY YELLED BACK TO
BACK-OFF, WE'RE HAVING PROBLEMS HERE, THEY TOLD ME TO DIG A HOLE
AND BURY THIS SLIMMY SLUDE WITH STENCH, THE MANAGER BURNY ROGERS
AND PLANT OFFICIALS STATED ITS HARMLESS, YOU CAN USE IT AROUND TH
PLANTS, I SAID NO WAS ITS SLIMMY, IT TOOK 8/10 DAYS TO DRY AND I
USED MY LOADER DUG A HOLE AND BURYED IT, IT MADE ALOT OF DUST, TH
HAPPENED (5 TIMES OVER 6 YEARS, THE ILLEGAL SPILLS GOT WORST IN
AMOUNTS OF SEWAGE SPILLS, I COMPLAINED TIME AND TIME AGAIN AND I
DEMANDED THEY STOP THE ILLEGAL FLOW, BUT THEY GOT REAL ANGRY AND
TOLD ME TO CLEAN IT UP, I DEMANDED THEY SEND A CREW OVER WITH LOAD
AND TRUCK TO CLEAN IT UP, ITS NOT MY PROBLEMS, I SENT LETTERS AND
SHOWED (28 PHOTOGRAPHS OF THEIR RAW SEWAGE FLOWING THROUGH THEIR
FENCE, THEY REFUSED TO CORRECT THE PROBLEMS,

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. IN 1993 I WAS DIAGNOSED WITH LEUKEMIA AFTER YEARS OF BEING FORCED AND EXPOSED TO CONTAMINATED SEWAGE SLUDGE DUST DOCTORS RECOMENDED CHEMO AND RADIATION, NO WAY, BAD NEWS, STARTED TAKING CHINESE HERBS, BERBERIS, DANG SHEN ROOT, GOLDEN SEAL AND SWEET WORM WOOD(ARTEMISININ FOR YEARS,) I DEVELOPED KIDNEY STONES AND GOLDEN SEAL MELTED THEM OUT, WHEAT GRASS JUICE, A-PLUS AND THE FAMOUS " BUDWIG DIET OF COTTAGE CHEESE AND PURE FLAX SEED OIL THESE HERBS KEPT ME ALIVE FOR YEARS MY LEUKEMIA WAS DOWN TO (ZERO) MY PROSTATE CANCER NOW TAKE A FORULATION FROM DR. YANG, PROSTATE CURE, RIGHT NOW I'M STABLE

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

MY HEALTH WAS DESTROYED BY THESE DEFENDANTS " NEGLIGENCE" AND LACK OF CARE TO WARN OF THE DANGERS OF THIS CONTAMINATED DUST I CAN NEVER GET MY ORIGINAL HEALTH BACK, I'M SICK WITH LEUKEMIA AND PROSTATE CANCER PLUS MY LUNGS ARE RUINED FOR LIFE, I CAN'T WORK ANY MORE SINCE 1993 OVER TWENTY YEARS OF PAIN AND SUFFERING, I HAD VALUED MY HEALTH BEFORE I WAS FORCED TO EXPOSURE TO CONTAMINATED SEWAGE SLUDGE DUST, ALL I WANT IS COMPENSATION FOR THIS ILLNESS, CAN A MAN PLACE A DOLLAR AMOUNT FOR THAT, IT WOULD HAVE TO BE AT LEAST (5 MILLION DOLLARS, LEAVE THE HONEST JURY DECIDE THAT WHAT IS FAIR COMPENSATION HERE, I'M TOO WEAK TO GO OUT TO DANCES ANYMORE. (I WAS FORCED TO FILE FOR BANKRUPTCY)

ON NOV, 12, 2014 I REQUESTED TO REVIEW THE DEP RECORDS IN WILKES-BARRE, PA. ON THE UPPER SAUCON TOWNSHIP MUNICIPAL AUTHORITY SEWAGE TREATMENT PLANTS RECORDS OF MULTIPLE VIOLATIONS OF HIGH RELEASE OF CHEMICALS ABOVE THE LIMITS OF THE DEP REQUIREMENTS, DEFENDANTS FALSIFIED TEST RECORDS OF ACTUAL DISCHARGES INTO THE UPPER SAUCON CREEK KILLING TROUT BY THE HUNDREDS AND FAILED TO PROVIDE WARNINGS NOT TO TOUCH THIS ILLEGAL SPILLS OF CONTAMINATED SEWAGE SLUDGE THEY CONCEALED THIS EVIDENCE OF DANGERS TO HUMAN HEATH AND WATERS. SO THE DEFENDANTS COULD STAY IN BUSINESS UNTILL I "BLEW THE WHISTLE".

I DUMP FILL SOIL UP AGAINST THEIR FENCE TO PREVENT THE SEWAGE SLUDGE FROM VIOLATING MY BUSINESS PROPERTY, BUT THE SPILLS KEPT GETTING WORST AND MORE OF STENCH, THESE SPILLS WERE FROM THE TANKS EVEN BEFORE IT WENT THROUGHT THE PROCESSING STAGES TO MODIFY THEM I HAVE (5 CHILDREN THAT COME TO MY NURSERY, I CAN'T HAVE THEM SMELL THIS STENCH, IT SEEMED THE MORE ANGRY I GOT AND THE MORE OF DEMANDS TO PREVENT THE ILLEGAL DISCHARGES THE MORE THEY "SPITED ME AND DELIBERATELY ALLOWED THE SPILLS UNTO MY PROPERTY, FROM THEIR FENSE THROUGH MY (3 ACRES) OF LAND AROUND MY BUILDINGS AND OFFICE I HAD CUSTOMERS DRIVE IN AND ASK WHAT IS THAT SMELL, ITS SEWAGE FROM THE PLANT NEXT DOOR, THE OFFICIAL KEPT TELLING ME IT WAS HARMLESS IT TOOK 2/3 HOURS TO CLEAN UP THEIR SILLS, IT WAS VERY DUSTY.

ORIGINALLY I WAS A VERY HEALTHY GUY RAISING (5 CHILDREN) I DID NOT SMOKE OR DRINK, THAT IS ALCOHOL OR DOING DRUGS, I WAS ALWAYS FIGHTING FOR THE " PRESERVATION OF THE ENVIRONMENT" I WAS INSPIRED BY THE " IRON EYES CODY" THE CRYING INDIAN ON A LAKE OF GARBAGE, AND THE ERIN BROCKOVICH STORY AND TOOK MY COMPLAINT DIRECTLY TO THE DISTRICT MANAGER OF THE DEPARTMENT OF ENVIRONMENTAL PROTECTION LEE OBERDICK IN HARRISBURG, PA. WITH AN APPOINTMENT, I PRESENTED MY COMPLAINT AND WANTED TO KNOW WHAT RIGHTS I HAVE TO FIGHT THIS UNLAWFUL VIOLATIONS, I TOLD LEE THE DISCHARGE INTO THE SAUCON TOWNSHIP CREEK IS KILLING HUNDREDS OF TROUT AND TURTLES THAT THE STATE STOCK IN THIS FRESH WATER STREAM, MR. LEE OBERDICK INFORMED ME HE WOULD SEND TWO AGENTS OUT TO INVESTIGATE MY COMPLAINTS THAT IS THEY WOULD COME IN UNMARKED VEHICLES AND INCOGNITO, THEY CAME IN ABOUT 1984, TWO DEP AGENTS TO TAKE PHOTOGRAPHS AND TESTING EQUIPMENT AND TESTED THE DISCHARGE PIPE THAT DUMPS RIGHT INTO THE SAUCO CREEK, THE AGENTS SAID " O MY GOD THIS DISCHARGES ARE 7/8 TIMES HIGHER OF AMMONIA-NITROGEN (NH4) THEN THEY ARE ALLOWED, THE RECORDS SHOW THE LIMITED ALLOWANCE IS POINT (0.5) INTO THIS FRESH WATER STREAM, THE AGENTS TOOK PHOTOGRPHS OF THE DISCHARGED SEWAGE PATH THROUGHT THE FENCE AND TOOK THEIR EQUIPMENT AND WENT OVER TO THE UPPER SAUCON TOWNSHIP SEWAGE TREATMENT PLANT AND SHOWED THEIR BADGES AND ORDERED EVERYONE OUT OF THE PLANT AND PLACED A SIGN ON THEIR GATE AND A BIG LOCK ON IT, THE UPPER SAUCON TOWNSHIP FOUGHT FOR OVER A YEAR IN VIOLATIONS AND WERE FORCED TO CLOSE DOWN THE PLANT "PERMANENTLY".

AFTER THE PLAINTIFF " BLEW THE WHISTLE" ON THE UPPER SAUCON TOWNSHIP SEWAGE PLANT TO THE DEP AND THE OFFICIALS FOUND OUT IT WAS ME THAT TURNED THEM IN FOR THEIR "POLLUTING THE ENVIRONMENT" THERE WAS A DEEP HATRED AGAINST THE PLAINTIFF, TWO WEEKS AFTER THE CLOSING OF THE SEWAGE PLANT, AT 3:00 AM. SOMEONE THREW A LARGE BRICK RIGHT THROUGH MY PICTURE WINDOW WHERE MY DAUGHTERS WERE SLEEPING AND SCARED THE FAMILY TO DEATH, MY MOTHER WAS WORRIED AND DEEPLY CONCERNED OF WHO WOULD DO THAT.

THE UPPER SAUCON TOWNSHIP WERE FORCED TO CLOSE AND CLEAN OUT THE RUPTURED LAGOON AND PIPES AND BUILDINGS AT A COST OF \$550,000 AND BUILD A NEW PLANT (2 MILES AWAY FOR 12.5 MILLION DOLLARS) THEY BRANDED THE PLAINTIFF AS A TROUBLE MAKER AND HAD THEIR POLICE OFFICERS CONSTANTLY BADGER AND CHARGE THE PLAINTIFF WITH BOGUS CLAIMS, THE OFFICIALS WERE OUT TO DESTROY THE PLAINTIFF'S LANDSCAPE AND NURSERY BUSINESS WITH MALICIOUS LIES TO TURN PEOPLE AGAINST THE PLAINTIFF, THE POLICE CREATED A " HOSTILE ENVIRONMENT" FOR THE WHISTLE BLOWER.

YEARS LATER THE PLAINTIFF STARTED GETTING ILL, TROUBLE BREATHING WEAK AND TIRED ALL THE TIME, WENT FOR A PHYSICAL AND I WAS DIAGNOSED WITH " LEUKEMIA" IN MARCH, OF 1993 AND IN AROUND 2003 I WAS DIAGNOSED WITH PROSTATE CANCER, I HAD TROUBLE BREATHING AND WAS NOT ABLE TO RUN ANY MORE, IN 1991 I HIKE THE END OF THE APPALACHIAN TRAIL IN MAINE TO THE TOP ON MOUNT KATAHDIN AND BACK, IN 1987 I RAN THE NEW YORK CITY MARATHON AND AGAIN IN 1988 AND FINISHED BOTH RACES AND IN AROUND 1990 I RODE MY BIKE 80 MILES FROM COOPERSBURG, PA. TO THE LAKE WALLENPAUPAC IN NORTHERN PA., BACK THEN I WAS IN GOOD PHYSICAL SHAPE UNTILL THE UPPER SAUCON TOWNSHIP SEWAGE SPILLS "ENDANGERED MY LIFE" WITH CONTAMINATED SEWAGE SLUDGE DUST, THE OFFICIALS FAILED TO CLEAN UP THERE ILLEGAL SPILLS AND FORCED THE PLAINTIFF OVER (5 YEARS WITH 5 ILLEGAL DISCHARGES UNTO THE PLAINTIFF'S OWN BUSINESS PROPERTY, THEY FAILED TO WARN ME OF THE DANGERS AND FAIL TO SEND CREWS OVER TO CLEAN UP THIS SLIMY SEWAGE SLUDGE, THEY HAVE FAILED TO MAKE ANY EFFORTS TO STOP THE VIOLATIONS AND DIDN'T CARE AT ALL AND DESTROYED MY HEALTH.

(IV) INJURED: CONTINUED.

THE POLICE WANTED MORE REVENGE AGAINST THE " WHISTLE BLOWER" SO THE POLICE OFFICERS INFORMED THE SALVOR THAT THESE ABANDONED VEHICLES AND LANDSCAPE, NURSERY EQUIPMENT WORTH \$141,000.00 WAS STOLEN SO THE SALVOR A FRIEND OF THE POLICE HELPED HIMSELF AND STOLE THE PLAINTIFF'S ENTIRE EQUIPMENT UNDER FALSE PRETENSES THAT IT WAS STOLEN ALONG WITH (290 LARGE SPECIMEN TREES) THAT THE SALVOR STOLE WORTH \$217,000.00, THE POLICE OFFICERS CLAIMED THEY KNEW NOTHING AND WOULD LOOK INTO THE THEFTS, YEARS PASTED, THE PLAINTIFF WAS FORCED INTO BANKRUPTCY ON AUG,27,2014 WITH \$358,000 .00 IN LOSSES, THE POLICE OFFICERS WERE HAVING A BALL AS DESTROYING THE PLAINTIFF'S LIFE, THE POLICE FAILED TO INFORM THE PLAINTIFF OF WHAT TOOK PLACE AND LEFT HIM TO ALL THESE PROBLEMS, ON JUNE,27 , ,2014 THE PLAINTIFF BY ACCIDENT LOCATED HIS STOLEN PROPERTY AT THE SALVOR'S BUSINESS PROPERTY AND QUICKLY REPORTED IT TO THE UPPER SAUCON TOWNSHIP POLICE, BUT THE POLICE KNEW WHAT HAPPENED AND DID NOTHING TO RESOLVE THE MATTER, THE POLICE WERE HAVING FUN AT THE EXPENSE OF THE PLAINTIFF ALL BECAUSE HE " BLEW THE WHISTLE" ON THEM, THE PLAINTIFF IS AN "ENVIRONMENTALIST" HERE IN PRESERVATION OF FUTURE GENERATIONS TO COME OR WHAT WILL BE HERE" LAKES OF GARBAGE" POOR HEALTH FOR EVERYONE.

(V) RELIEF:

THESE POLICE OFFICERS WHO CREATED THIS MALICIOUS LIES AGAINST THE PLAINTIFF, SHOULD BE LIABLE FOR THEIR "IGNORANCE AND MALICE" THESE POLICE ARE TOTALLY RESPONSABLE FOR THE PLAINTIFF'S LOSSES OF \$358,000.00 IN THEIR " UNSCRUPULOUS ACTIONS" OUT OF HATRED CREATED THESE HATE CRIMES AGAINST THE PLAINTIFF WHO ACTED TO SAVE THIS EARTH FROM " UNSCRUPULOUS PEOPLE LIKE THE UPPER SAUCON TOWNSHIP OFFICIALS.

(IV) INJURIES:

THE UPPER SAUCON TOWNSHIP OFFICIALS AND THE POLICE OFFICERS HAD A DEEP HATRED FOR THE " WHISTLE BLOWER" THAT CAUSED ALOT OF EXPENSE TO THEM ON DEC,2014 THE PLAINTIFF RECEIVED INFORMATION THAT UPPER SAUCON TOWNSHIP POLICE OFFICERS BRIAN HAWK AND AMY HAWK, THAT WAS AMY GETZ BEFORE SHE DESTROYED MRS.HAWK'S MARRIAGE BOTH THESE OFFICERS KNEW THAT THERE WAS A THEFT OF LARGE TREES AND EQUIPMENT FROM GREENTREE NURSERIES FOR A TOTAL OF \$160,000.00 AND RICHARD W. BENCKINI WAS CHARGED, WHO OWNED RICHARD BENCKINI LANDSCAPING IN ALLENTOWN,PA., THESE OFFICERS SEEN AN OPPORTUNITY TO DESTROY THE PLAINTIFF'S BUSINESS, TITLED BENCKINI NURSERIES AND THE BROTHER OF RICHARD BENCKINI, BORN OUT OF HATRED THESE OFFICERS NAMED IN THIS CIVIL ACTION, THESE OFFICERS PROVIDED FALSE AND MALICIOUS LIES TO LANDLORD LLOYD LICHTENWALNER WHERE THE PLAINTIFF LEASED LAND FOR HIS NURSERY GROWING BUSINESS AND STATED THAT THESE PLAINTIFF'S TREES AND EQUIPMENT WERE STOLEN FROM GREENTREE NURSERIES, OF COURSE THAT WAS NOT TRUE, BUT MR. LLOYD LICHTENWALNER PREVENTED THE PLAINTIFF FROM REMOVING HIS TREES AND EQUIPMENT FROM LEASED LAND THAT WAS PAID IN FULL TO DATE AND ENCOURAGED THE LANDLORD TO FILE BOGUS POLICE CLAIMS THAT THE PLAINTIFF HAD " ABANDONED HIS VEHICLES ", OF COURSE THIS ALSO WAS FALSE, BASED ON THE MALICIOUS LIES OF THESE OFFICERS, THESE FALSE CLAIMS OF "ABANDONED VEHICLES " WAS ALL DONE BEHIND THE PLAINTIFF'S BACK AND IN VIOLATION OF TITLE 75,CHAPTER 73,SEC.7311.1 THAT THE LANDLORD MUST PROVIDE WRITTEN NOTICE TO THE OWNER OF THE VEHICLES, BUT FAILED TO DO SO, THE POLICE HAD THE LANDLORD SIGN THE FALSE CLAIM AND THESE POLICE OFFICERS FILED AN ABANDONED VEHICLE REPORT ON FORM TITLE 75,CHAPTER 73,SEC,7305 WHICH REQUIRED POLICE TO NOTIFY THE OWNER BY CERTIFIED MAIL, RETURN RECEIPT OF HIS RIGHTS TO A HEARING TO RESOLVE THE ALLEGATIONS, SINCE THE POLICE DESPISED THE PLAINTIFF, THEY NEVER INFORMED HIM OF HIS RIGHTS, THE POLICE THEN INFORMED THE LOCAL SALVOR TO REMOVE THE ABANDONED VEHICLES, WITHOUT ANY NOTICE TO THE OWNER, WHO IN TURN REPORTED ITS THEFTS TO THE SAME POLICE OFFICERS, WHO WERE LAUGHING ABOUT THIS TRICK,

THE DEFENDANTS THROUGH THEIR NEGLIGENCE FAILED TO MAINTAIN THE LIMITED AMOUNT OF CHEMICALS DISCHARGED INTO THE SAUCON CREEK THAT DRIFTED INTO THE WELL WATER OF EDWIN MOYER AND POISONED HIS DRINKING WATER WITHOUT PROVIDING ANY WARNING TO POSSIBLE CONTAMINATION OF WELL WATER THAT HAD LEADED TO EDWIN MOYERS LIVER CANCER AND HIS DEATH ON MAY, 19, 1995, HIS WELL WATER WAS PURE BEFORE THE UPPER SAUCON TOWNSHIP MUNICIPAL AUTHORITY SEWAGE TREATMENT PLANTS ILLEGAL DISCHARGES OF HIGH CHEMICAL LEVELS ONLY 75 FEET AWAY FROM THEIR DISCHARGE PIPE, THE RECORDS SHOW THE CHEMICAL DISCHARGES WERE LIKE BLACK PAINT POISONING EVERYTHING IN ITS PATH, THE PLAINTIFF WAS THE EXECUTOR OF THE ESTATE FOR MY BEST FRIEND, EDWIN MOYER.

(V) RELIEF:

- (V) MR. EDWIN MOYER'S HEATH WAS DESTROYED BY DEFENDANTS GROSS NEGLIGENCE BY NOT PROVING REQUIRED WARNINGS OF POSSIBLE CONTAMINATION OF WELL WATER BECAUSE OF THE DEP VIOLATIONS AND LIMITED DISCHARGES INTO THE SAUCON CREEK WATER THAT POISONED EDDY MOYER'S WELL WATER THAT LED TO HIS LIVER CANCER AND HIS DEATH ON MAY 19, 1995 WHEN HE BECAME A VICTIM OF THE DEFENDANTS NEGLIGENCE, THE DEFENDANTS KNEW VERY WELL THAT THIS CONTAMINATION COULD LEAD TO POISONED WELLS AND FAILED TO DO ANYTHING TO PREVENT THE LIVER CANCER AND DEATH OF EDDY MOYER, THE DEFENDANTS SHOULD COMPENSATE THE ESTATE OF EDDY MOYER FOR YEARS OF PAIN AND SUFFERING BEFORE HIS DEATH, AND AWARD OF (3 MILLION DOLLARS WOULD BE FAIR COMPENSATION,) THE DEP RECORDS OF GROSS CONTAMINATION FROM THEIR RAW SEWAGE TANKS AND POOR MAINTANCE AND CONSTRUCTION THAT HAD LED TO POLLUTION OF HEALTH, THE DEFENDANTS QUICKLY DUMPED FILL SOIL ON EDDY'S WELL TO CONCEAL THE EVIDENCE AFTER EDDY DIED OF LIVER CANCER FAIR COMPENSATION SHOULD BE UP TO THE JURY IF NEEDED.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 6 day of Oct. 2015, 20 .

Signature of Plaintiff

Mailing Address

612 LOCUST ST.

COOPERSBURG, PA. 18036

EXECUTOR OF EDWIN MOYER ESTATE

Telephone Number

CELL- 484-767-8102

Fax Number (if you have one)

X

E-mail Address

ENVIROPRISES@.GMAIL.COM

PLAINTIFF, EDWIN MOYER IS DECEASED, MAY 19, 1995

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____